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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SANDRA GROGAN,

Plaintiff,

V.

ALLIED SOLUTIONS, LLC; OHIO
INDEMNITY COMPANY; SECURE
COLLATERAL MANAGEMENT;
INTOUCH CREDIT UNION; AND
RECOVERY NETWORK OF NEVADA,
INC.

Defendants.

CASE NO.: 2:24-CV-01669-APG-MDC

**STIPULATION AND ORDER TO
EXTEND DEFENDANTS ALLIED
SOLUTIONS, LLC, OHIO
INDEMNITY COMPANY, SECURE
COLLATERAL MANAGEMENT,
AND RECOVERY NETWORK OF
NEVADA, INC., TIME TO FILE A
RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT
(ECF NO. 1)**

(FIRST REQUEST)

Plaintiff Sandra Grogan ("Plaintiff"), by and through her counsel of record, George Haines, Esq., and Gerardo Avalos, Esq., of the law firm Freedom Law Firm, LLC, Defendants Allied Solutions, LLC ("Allied"), Ohio Indemnity Company ("Ohio"), and Secure Collateral Management ("Secure"), by and through their counsel of record, Tabetha J. Steinberg, Esq. and Christian T. Balducci, Esq., of the law firm of Marquis Aurbach, and Defendant Recovery Network of Nevada, Inc. ("Recovery"), by and through its counsel of

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1 record, Jeff Sloane, Esq., of Sloane/Tygret Law Group, hereby jointly agree and stipulate as
2 follows:

- 3 1. Plaintiff filed her Complaint on September 10, 2024 (ECF No. 1);
- 4 2. Allied, Ohio, Secure, and Recovery's current deadline to respond to Plaintiff's
- 5 Complaint is October 11, 2024;
- 6 3. Allied, Ohio, Secure, and Recovery are unable to meet the October 11, 2024,
- 7 deadline to file a responsive pleading to Plaintiff's Complaint;
- 8 4. The parties are also discussing potential settlement and resolution of Plaintiff's
- 9 claims as alleged in her Complaint;
- 10 5. Plaintiff does not oppose granting Allied, Ohio, Secure, and Recovery an
- 11 extension to file a responsive pleading to the Complaint;
- 12 6. Pursuant to LR IA 6-1, Allied, Ohio, Secure, and Recovery request for this Court
- 13 to grant an extension of time to file a responsive pleading for thirty (30) days;
- 14 7. The new deadline for Allied, Ohio, Secure, and Recovery to file a responsive
- 15 pleading to Plaintiff's Complaint is stipulated and agreed to be November 9,
- 16 2024;
- 17 8. This is Allied, Ohio, Secured, and Recovery's first request to extend the deadline
- 18 to file a responsive pleading to Plaintiff's Complaint; and
- 19 9. This Stipulation is being made in good faith and not for purposes of delay.

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1 **IT IS SO STIPULATED.**

2 Dated this 11th day of October, 2024

Dated this 11th day of October, 2024

3 **MARQUIS AURBACH**

FREEDOM LAW FIRM, LLC

4
5 By: /s/ Christian T. Balducci
Christian T. Balducci, Esq.
6 Nevada Bar No. 12688
Tabetha Steinberg, Esq.
7 Nevada Bar No. 16756
10001 Park Run Drive
8 Las Vegas, Nevada 89145
Attorneys for Defendants Allied
9 Solutions, LLC, Ohio Indemnity
10 Company,
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11

By: /s/ Gerardo Avalos
George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, Esq.
Nevada Bar No. 15171
8985 South Eastern Avenue
Las Vegas, Nevada 89123
Attorneys for Plaintiff

12 Dated this 11th day of October, 2024

13 **SLOANE/TYGRET LAW GROUP**

14
15 By: /s/ Jeffrey G. Sloane
Jeffrey G. Sloane, Esq.
16 Nevada Bar No. 784
510 South 8th Street
17 Las Vegas, Nevada 89101
Attorneys for Defendant Recovery Network of
18 Nevada, Inc.

19 **ORDER**

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21 The above Stipulation is hereby GRANTED.

22 IT IS SO ORDERED:

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Hon. Maximiliano D. Couvillier III
United States Magistrate Judge

26 DATED: 10/15/2024